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September 14, 2016

By ECF

Honorable P. Kevin Castel
United States District Court
500 Pearl Street
New York, NY 10007-1312

Re: **United States v. Gabriel Aguirre-Cuero**
15 CR 125 (PKC)

Dear Judge Castel,

I write, on consent of the Government, to request an adjournment of the pretrial conference scheduled in the above referenced matter for September 16, 2016. The Government has extended a plea offer to Mr. Aguirre-Cuero that he intends to accept, however, additional time is required to prepare him for the plea colloquy.

I will be out of the office the last two weeks of September, and, therefore, I request that the pretrial conference be adjourned for approximately 30 days. I propose the following days: October 13, 17, or 19th. These dates are also acceptable to the Government. Mr. Aguirre-Cuero intends to enter a plea on the adjourn date.

Mr. Aguirre-Cuero consents to the exclusion of time under the Speedy Trial Act.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/
Amy Gallicchio
Attorney for Gabriel Aguirre-Cuero

Cc: AUSA Emil Bove (via email)